

# **EXHIBIT A**



## RESPONSE TO CHAPTER 7 TRUSTEE REQUEST FOR INFORMATION

Date: April 8, 2019

Approved: Seth R. Freeman, CIRA, CTP, Managing Director

1. **Current status of the schedules and statements for each of the four entities, including summary of work done to date and what remains to be completed;**

	Entity	Conversion Report	SOFA & Schedules
1	Brandy Boy	Done	Done
2	Dog blue	Done	Done
3	140 Mason	Done	Done
4	147 Channel Road	Done	Done
5	Park Road	Done	Done
6	Dora Dog	Done	Done
7	Double Jump	Done	Done
8	Solutions		
9	Distribution	Final Editing & Assembling	
10	Freedom	Final Editing & Assembling	

### Summary Status:

- a) Final Reports for 9 entities 90% complete
- b) Waiting only professional fee balances and entity allocations and packaging of exhibits for completed Final Reports
- c) Solutions Final Report 70% complete
- d) Documents required to complete all the remaining SOFA's and Schedules have been assembled
- e) SOFA and Schedule information and data to be penciled and reviewed for pre-entry accuracy & completeness
- f) Enter into software system
- g) Quality assurance review and edits
- h) Final Print and final review



2. Estimate of hours to complete the work broken down by entity, including estimate of hours by professional with rate;

TO DO					
Solutions	Conversion Report	Hourly Rate	Total		Blended Rate
Kelley	6	\$ 375.00	\$ 2,250.00		
Shannon	6	\$ 160.00	\$ 960.00		
George	2	\$ 375.00	\$ 750.00		
Seth	1	\$ 450.00	\$ 450.00		
	15			\$ 4,410.00	294.00
Property LLCs	Edit & Package Conversion Report	Hourly Rate	Total		
Kelley	6	\$ 375.00	\$ 2,250.00		
Shannon	6	\$ 160.00	\$ 960.00		
George	3	\$ 375.00	\$ 1,125.00		
Seth	3	\$ 450.00	\$ 1,350.00		
	18			\$ 5,685.00	315.83
Solutions	SOFA & Sch's	Hourly Rate	Total		
Kelley	10	\$ 375.00	\$ 3,750.00		
Shannon	8	\$ 160.00	\$ 1,280.00		
George	5	\$ 375.00	\$ 1,875.00		
Seth	1	\$ 450.00	\$ 450.00		
	24			\$ 7,355.00	306.46
Distribution	SOFA & Sch's	Hourly Rate	Total		
Kelley	10	\$ 375.00	\$ 3,750.00		
Shannon	8	\$ 160.00	\$ 1,280.00		
George	5	\$ 375.00	\$ 1,875.00		
Seth	1	\$ 450.00	\$ 450.00		
	24			\$ 7,355.00	306.46
Freedom	SOFA & Sch's	Hourly Rate	Total		
Kelley	8	\$ 375.00	\$ 3,000.00		
Shannon	5	\$ 160.00	\$ 800.00		
George	2	\$ 375.00	\$ 750.00		
Seth	1	\$ 450.00	\$ 450.00		
	16			\$ 3,750.00	234.38
			TOTAL	\$ 28,555.00	



**3. Estimated date of completion: Ten days from date of engagement, or sooner.**

**4. Summary of time billed during the chapter 11 (and pre-petition amounts owed, if any);**

- a) We received \$375,000 in retainer.
- b) Pre-petition charges billed against retainer were \$83,911.94
- c) Retainer on hand post-petition was \$291,088.06
- d) Post-petition CRO services invoice was \$ 175,455.00
- e) Post-petition FA services invoiced was \$ 177,291.00
- f) Amount exceeding retainer, is approximately \$ 91,315.79, prior to final invoicing.
- g) The total Post-Petition Chapter 11 time charges are approximately \$352,746.00.
- h) The total time billed is approximately 1,060 hours

**5. Description of pre-petition relationship with any of the Debtors or parties related to the bankruptcy**

- a) GlassRatner, nor Seth R. Freeman, individually, had any prior relationship with Debtors or any related parties.

**6. Time spent post-conversion to present for each of the four entities.**

- a) We have requested a WIP report from the accounting department. Much of Seth R. Freeman time is general time but can be allocated.
- b) In the aggregate we have incurred approximately 80 hours of time broken into 4 categories:
  - a. Time spent immediately after Conversion hearing in organizing for the Trustees and organizing, protecting and preserving data and information and preparation of "hand-over" information, consultation with counsel; providing information to the Trustees.
  - b. Time spent on preparing to physically winding-down activities in the premises, copying and backing-up data, preparing for meeting with Trustees on site. Picking-up and sorting mail; administration/bookkeeping such as entering pre and post conversion payables to ensure accuracy of Final Reports.
  - c. Preparation of Final Reports mainly by my team and SOFA/Schedules project planning.
  - d. Seth Freeman specific activities, such as retention matters; on-site meeting with the Trustees. Communications by email and responding to Trustees; consultation with counsel on post-conversion matters, on-site meeting with alarm and security service; answering and forwarding tenant concerns; responding to Crestmark/Metabank MSG removal; locksmith to relocate a truck; technology and systems resources issues. Responding to various third-parties with concerns or questions.